# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

V.

WILSON DANIEL FREITA DA COSTA,

a/k/a, "Wilson Costa," a/k/a, "Wilson Dakosta," a/k/a, "Watson Bisong," a/k/a, "Watson Bisong Dacosta,"

Defendant.

#### SEALED INDICTMENT

23 Cr.

93 CRIM 610

### COUNT ONE (Wire Fraud)

The Grand Jury charges:

1. From at least in or about August 2017 through at least in or about 2019, in the Southern District of New York and elsewhere, WILSON DANIEL FREITA DA COSTA, a/k/a "Wilson Costa," a/k/a, "Wilson Dakosta," a/k/a, "Watson Bisong," a/k/a, "Watson Bisong Dacosta," the defendant, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, DA COSTA, in his capacity and within the scope of his duties as a senior executive for a New York Stock Exchange-traded, U.S. multinational corporation ("Company-1"), forged documentation purportedly from officials of a foreign country ("Country-1"), and purportedly signed by an officer at another company ("Company-2") and stamped with Company-2's stamp, to fraudulently obtain

money and property from Country-1, in part to benefit Company-1, and caused wires to be sent to and from the Southern District of New York and elsewhere, in furtherance of that scheme.

(Title 18, United States Code, Sections 1343 and 2.)

## COUNT TWO (Aggravated Identity Theft)

The Grand Jury further charges:

2. From at least in or about August 2017 through at least in or about 2019, in the Southern District of New York and elsewhere, WILSON DANIEL FREITA DA COSTA, a/k/a "Wilson Costa," a/k/a, "Wilson Dakosta," a/k/a, "Watson Bisong," a/k/a, "Watson Bisong Dacosta," the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, DA COSTA used and transferred the name and title of a particular government official from Country-1 ("Official-1") during and in relation to the wire fraud violation charged in Count One of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

# COUNT THREE (Aggravated Identity Theft)

The Grand Jury further charges:

3. From at least in or about August 2017 through at least in or about 2019, in the Southern District of New York and elsewhere, WILSON DANIEL FREITA DA COSTA, a/k/a "Wilson Costa," a/k/a, "Wilson Dakosta," a/k/a, "Watson Bisong," a/k/a, "Watson Bisong Dacosta," the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, DA COSTA used and transferred the

name and title of a particular government official from Country-1 ("Official-2") during and in relation to the wire fraud violation charged in Count One of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

### COUNT FOUR (Aggravated Identity Theft)

The Grand Jury further charges:

4. From at least in or about August 2017 through at least in or about 2019, in the Southern District of New York and elsewhere, WILSON DANIEL FREITA DA COSTA, a/k/a "Wilson Costa," a/k/a, "Wilson Dakosta," a/k/a, "Watson Bisong," a/k/a, "Watson Bisong Dacosta," the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, DA COSTA used and transferred the name and title of an officer from Company-2 during and in relation to the wire fraud violation charged in Count One of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2.)

#### FORFEITURE ALLEGATION

5. As a result of committing the offense alleged in Count One of this Indictment, WILSON DANIEL FREITA DA COSTA, a/k/a "Wilson Costa," a/k/a, "Wilson Dakosta," a/k/a, "Watson Bisong," a/k/a, "Watson Bisong Dacosta," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

#### **SUBSTITUTE ASSETS PROVISION**

6. If any of the above described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

It is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

FOREPERSON

mb/agal 11/17/2023

DAMIAN WILLIAMS
United States Attorney